



Site Management Program

Situation | Landfill Post-closure Activities

Location | Northeastern United States

An international forest products company made a business decision to close a paper mill and associated landfill in the northeastern US. Under the approved post-closure plan for the landfill a variety of multi-media compliance obligations were required including daily, weekly, quarterly and annual inspections, monitoring and reporting. Because the company no longer had local employees, post-closure care became the responsibility of the already over-burdened corporate EHS staff.

Based on prior successes with PREMO's Site Management Program (SMP) at multiple remediation sites across the country, the company's corporate EHS staff turned to PREMO to assume overall responsibility for implementation of the post-closure activities. PREMO quickly assembled a multi-disciplinary team of field technicians, engineers, and scientists that could cost effectively evaluate the client's needs and cost-saving opportunities, and implement the required actions in the field. A detailed review of the permit and closure history and post-closure care plan was completed and the routine monitoring and inspection activities were organized into an overall Best Management Practices (BMP) Plan. Opportunities for technical and cost improvements and items requiring agency negotiation or expedited technical response were identified. Implementation strategies were developed in consultation with the client and immediately implemented. The opportunities and action items identified were:

- Upgrade groundwater sampling to low-flow purge methods in a revised Sampling Plan to improve data quality;
- Initiate groundwater, surface water, wetlands, and residential well monitoring data review for potential short-term and long-term program reductions;
- Screen prior mill consultants for potential ongoing roles in the program, adjust roles and level/reduce budgets, and entered into subcontracts for management of selected firms;
- Develop an aggressive vegetation repair plan to repair low-growth areas that were delaying agency acceptance of closure certification and increase inspection requirements and costs;
- Expedite repair of sedimentation damage in wetlands mitigation area to resolve Notice of Violation;
- Develop storm water management re-design options for interim control and long-term permanent correction of storm erosion areas and elimination of frequent erosion repair costs;
- Compile leachate volume, production rate, characteristics, and offsite disposal hauling data for evaluation of long-term leachate management options and cost-benefit analysis;
- Approach agency to close out landfill permit in favor of conducting ongoing activities under the post-closure plan, avoiding costly permit renewal process;
- Meet with agency to review action items and to communicate that "business as usual" operations were changing in favor of resolution of outstanding issues and a more aggressive ongoing compliance program; and,
- Provide technical support to client regarding access easements and property use issues with abutting land owner.

Results

To date, PREMO has maintained landfill compliance and successfully managed meetings and negotiations with the agency that have resulted in the following cost savings:

- Landfill permit renewal and associated costs avoided in favor of operating agreement under post-closure plan;
- Developed erosion controls to eliminate future repair costs;
- Completed closure certification with agency resulting in less frequent agency inspections and lower support costs;
- Consolidation of project team and budget leveling/reduction under one closely managed contract; and,
- Evaluated reductions in the monitoring program and performing cost benefit analysis for leachate management.